



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

June 19, 2025

BY ECF

The Honorable Jennifer L. Rochon
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

*Re: The New York Times Company v. United States Department of State,
No. 24 Civ. 8747 (JLR)*

Dear Judge Rochon:

This Office represents Defendant United States Department of State in the above-referenced case brought by Plaintiffs The New York Times Company and Amy Julia Harris, pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552. I write on behalf of all parties pursuant to the Court’s order that the parties submit joint status reports every 45 days. *See* Dkt No. 13.

On February 21, 2025, Plaintiffs, through counsel, sent Defendant a proposal to prioritize production of a narrower set of records and to defer processing of other records. Specifically, Plaintiffs proposed that Defendant prioritize processing the records responsive to Requests 11 and 12 in the Complaint (Dkt No. 1 ¶¶ 96-106) and a portion of the records responsive to Requests 2 and 3 (*id.* ¶¶ 48-58). On April 1, 2025, Defendant agreed to prioritize requests 11 and 12, reporting that it was currently working on those requests and that it was also reviewing Requests 2 and 3. On May 23, 2025, Defendant made its first production to Plaintiffs, consisting of records responsive to Requests 5, 6, and 7. Defendant reports that because it was already processing these records, this production did not include records responsive to Plaintiffs’ priority requests. Defendant plans to make its next production on or about July 3 and expects that production to include records responsive to Requests 2 and 3. Defendant will also provide Plaintiffs an update on the status of Requests 11 and 12 by June 27.

The parties will submit their next status report in 45 days—by August 4, 2025.

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Respectfully submitted,

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cc: All counsel of record (via ECF)